

REMARKS/ARGUMENTS

Claims 1-10 and 24-37 are pending in the present application and stand rejected.

Claims 30-32 and 34-37 are rejected under 35 U.S.C. 102 as being anticipated by United States Patent 6,195,622 to Altschuler et al. (hereinafter "Altschuler").

Claims 10-11 and 24-28 are rejected under 35 U.S.C. 103 as being unpatentable over Altschuler in view of United States Patent 6,177,862 Cromer et al. (hereinafter "Cromer").

Claim 29 and 33 are rejected under 35 U.S.C. 103 as being unpatentable over Altschuler in view of Cromer and further in view of United States Patent Application Publication 2003/0078964 to Parrella et al. (hereinafter "Parrella").

Claims 10-11, 28, and 30 are amended. No new matter has been added by the amendments. As discussed below, Applicants respectfully submit that the cited references do not anticipate or render obvious the pending claims. In particular, none of the cited references discloses selecting an access history from among a plurality of access histories based upon an access history identifier.

Rejections under Section 102

Claim 30 recites a method of operating a storage system. The method comprises "receiving a first command specifying a target computer, an access history identifier associated with the target computer...selecting an access history from a plurality of access histories associated with the target computer using the access history identifier; and updating the selected access history with information about data requested by the target computer." Applicants respectfully submit that Altschuler does not disclose a storage system with at least these features.

Altschuler discusses an Internet server that attempts to predict resource transitions. As explained in the reference, usage logs 102 store information about resources accessed by all of the users of a particular server computer. See, Fig. 1; col. 8, lines 12-18. Altschuler describes that usage logs 102 are combined to create a probability model of transitions among the resources which are linked by the server. Specifically, usage logs 102 are aggregated into usage trace data 142' which is then processed into a resource transition probability model

162'. See, Figs. 1-4. As a result, for example, it can be known that there is a 50% likelihood that any user accessing resource A will transition next to resource B.

Altschuler does not disclose that the Internet server maintains *a plurality of access histories associated with each computer* which accesses the server, or that the server selects among the plurality of access histories using an *access history identifier* received with a first command. Instead, Altschuler merely discloses a single usage log having information about all resource requests received at the server.

Moreover, there is no teaching or suggestion that an access history identifier associated with a specific target computer is used to select an access history from among a plurality of access histories associated with that computer. Altschuler does not disclose that the server receives a *first command* which specifies the target computer as well as the access history identifier used in making the selection. Finally, Altschuler does not disclose or suggest updating that specific access history (selected from among the plurality of access histories) with information about the target computer.

Accordingly, Applicants respectfully submit that Altschuler does not teach or suggest each and every limitation in the manner that is claimed. In particular, Altschuler does not disclose "*selecting an access history from a plurality of access histories associated with the target computer using the access history identifier.*" Altschuler's Internet server supplies only a usage log that is common to all users. There is no teaching or suggestion that an access history identifier is used to select among a plurality of access histories associated with a specified target computer. Altschuler additionally fails to disclose "*updating the selected access history with information about data requested by the target computer.*" There is no teaching or suggestion that the Internet server updates a specific access history that is selected from a plurality of access histories using the access history identifier. Instead, the same usage log is updated regardless of which computer accesses resources through the server.

Rejections under Section 103

Claim 10 recites a system including a storage device, a plurality of computers connected to the storage device, and a management computer. As claimed, the management

computer is "configured to transmit one or more first commands containing information for specifying computers in a first group of computers and *an access history identifier for each of the specified computers in said first group.*" The storage device is "configured to *maintain a plurality of access histories for each computer in the first group of computers*, wherein when a computer in said first group of computers...requests data from said storage device, said storage unit *records a storage location of the requested data in said disk device as a history that is linked with said access history identifier of said requesting computer* specified by said first commands." (emphasis added). Atschuler in view of Cromer does not teach or suggest a system with at least these features.

As discussed in connection with claim 30, Atschuler does not disclose a storage device that maintains a plurality of access histories for each computer which requests its resources, or that an access history identifier is used to select one from among a plurality of associated access histories. Atschuler also fails to disclose a storage device that receives first commands containing access history identifiers from a management computer or that such a storage device records a storage location of the requested data as a history that is linked with the access history identifier of the requesting computer specified by the first commands.

Cromer does not cure Altshuler's deficiencies. Cromer is directed to RFID tags used to simplify setting up workstations. It does not disclose or suggest the use of access histories, access history identifiers, or commands containing such information. Accordingly, Applicants respectfully submit that, whether taken alone or in combination, Atschuler and Cromer do not teach or suggest each and every limitation as claimed.

Dependent Claims

A. Claims 31-37

Claims 31-37 depend from claim 30 and are rejected based on the same rationale set forth in the rejection of claim 30. Each dependent claim incorporates the full set of limitations discussed in connection with claim 30, and each is therefore believed allowable over Altschuler for at least the reason that it depends from an allowable base claim.

Regarding claim 33, Applicants respectfully note that the Office Action incorrectly states that claim 30 was rejected over a combination of Altschuler and Cromer. See, Office Action at ¶¶23-24. In any case, neither of the secondary references (Cromer, Parrella) cures Altschuler's deficiencies as previously discussed. In particular, neither Cromer nor Parrella discloses at least the use of a plurality of access histories associated with a specified target computer or that an access history identifier included as part of a command is used to select an access history from among the plurality of access histories.

B. Claims 11, 24-29

Claims 11 and 24-29 are rejected over Altschuler in view of Cromer. Claim 29 is rejected over Altschuler in view of Cromer and further in view of Parrella. Each dependent claim incorporates all of the limitations of claim 10, and each is therefore believed allowable over Altschuler in view of Cromer as discussed above. Parrella does not cure the deficiencies of Altschuler and Cromer. Accordingly, Applicants respectfully submit that the cited references fail to disclose each and every limitation claimed and therefore do not render the claims unpatentable. Reconsideration and allowance of all pending claims is respectfully requested.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 858-350-6100.

Respectfully submitted,



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